UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER DISASTER SITE LITIGATION

21 MC 102 (AKH)

IRENEUSZ MIERZEJEWSKI AND KRYSTYNA MIERZEJEWSKI,

DOCKET NO. 06-CV-01513-AKH

Plaintiff(s),

v.

NOTICE OF DEPOSITION UPON ORAL EXAMINATION

90 CHURCH STREET LIMITED PARTNERSHIP, et al.,

Defendants.

PLEASE TAKE NOTICE, that pursuant to Fed. R. Civ. P. 30, the Defendants' Liaison Counsel and Defendants will conduct a deposition upon oral examination of Dr. Robert Grabowski, M.D., for plaintiff Ireneusz Mierzejewski ("Plaintiff") in the above-captioned lawsuit, before a notary public or other officer authorized by law to administer oaths, at 1:00 p.m. on the 15th day of November, 2013, at the offices of Day Pitney LLP, 7 Times Square, New York, New York, New York 10022, and on any adjourned date thereof, and from day to day thereafter until completed. You are invited to attend and cross-examine; and

PLEASE TAKE FURTHER NOTICE, that pursuant to Fed. R. Civ. P. 34, Defendants have requested that Dr. Grabowski produce for inspection and copying all documents and things in response to the requests set forth in the subpoena and accompanying Schedule "A" attached hereto at a time and place mutually agreeable to counsel prior to the depositions; and

PLEASE TAKE FURTHER NOTICE that the deposition may be videotaped.

Dated: New York, New York October 31, 2013

DAY PITNEY LLP

By:

Rasika Chakravarthy
For the Firm

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On behalf of the Defense Liaison Committee for Defendants in the 21 MC 102 and 21 MC 103 Dockets and as Attorneys for Defendant Deutsche Bank Trust Company Americas Deutsche Bank Trust Corporation DB Private Clients Corporation DBAB Wall Street LLC

TO: Gregory J. Cannata and Robert A. Grochow Gregory J. Cannata and Associates 233 Broadway, 5th Floor New York, New York 10279